

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,)
JOSE RAMIREZ, CLEMENTE HERNANDEZ,)
CESAR PIZARO, ELISON PENA,)
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,)
ANGEL BAEZ, ANTONIO MARTINEZ,)
WILFREDO ORTIZ, EULOGIO ORTIZ,)
MIRRAIN MIRANDA, RAFAEL MORENO,)
NELSON ACEVEDO, and)
RAMON RODRIQUEZ,)

Plaintiffs,)

v.)

SHERMAN-FEINBERG CORPORATION,)
FARNSWORTH FIBRE CORPORATION,)
and UNITED STEELWORKERS OF AMERICA,)
LOCAL 421-U,)

Defendants.)

Civil Action No.
04-10892-JLT

DECLARATION OF THERESA MERRILL

I, Theresa Merrill, declare as follows:

1. I am an assistant general counsel with the United Steelworkers of America, AFL-CIO/CLC, Five Gateway Center, Pittsburgh, Pennsylvania, 15222.
2. I have been a member in good standing of the Bar of the State of New York since January 25, 2000.
3. I have been a member in good standing of the Bar of the Commonwealth of Pennsylvania since November 22, 2002.

4. I am a member of the United States District Court for the Eastern District of Missouri, the Northern District of Ohio and the Western District of Pennsylvania. I am also a member of the United States Court of Appeals for the Fourth, Fifth and Sixth Circuits.

5. I am a member in good standing in all jurisdictions to which I have been admitted.

6. There are no disciplinary proceedings pending against me in any Bar to which I have been admitted.

7. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare that the foregoing is true and correct under penalty of the laws of perjury.

Theresa Merrill

Theresa Merrill

Dated: December 15, 2004